Transmitted by E-mail on 9/15/16

EPA and NJDEP Comments on
Ecological Evaluation Report — Rockaway River and Eastern Drainage Ditch
Dayco Corporation/LE Carpenter Corp. Superfund Site, Borough of Wharton, New Jersey
Dated August 2016

1. **Page 2-1, Section 2, Relevant Ecological Resources:** It is stated in the report that, "Consistent with USEPA Risk Assessment Guidance for Superfund (ERAGS, 1997) ecological evaluations focus on *relevant ecological resources and habitats — i.e.,* the ecological resources that are valued at the site. Identification of relevant ecological receptors and habitats is dependent upon site-specific factors. Examples of relevant ecological resources may include species or communities afforded special protection by law or regulation; recreationally, commercially, or culturally important resources; regionally or nationally rare habitats or communities; communities with high aesthetic quality; and habitats, species, or communities that are important in maintaining the integrity and biodiversity of the environment."

   The Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments Interim Final [U.S. Environmental Protection Agency, Environmental Response Team, Edison, NJ, June 5, 1997] or ERAGS guidance should not be referred to as "USEPA Risk Assessment Guidance for Superfund." As stated in the ERAGS guidance the phrase "ecological risk assessment," refers to a qualitative and/or quantitative appraisal of the actual or potential impacts of contaminants from a hazardous waste site on plants and animals other than humans and domesticated species. Relevant resources may more appropriately refer to those ecological receptors which would have a potential complete exposure pathway to site contamination.

2. **Page 4-2, Section 4.1.1, Surface Water:** Background surface water sample SW-EDD-B2 could be impacted by the facility located immediately upgradient of the Dayco/LE Carpenter Site, and therefore, is considered unsuitable as a surface water background reference area sample.

3. **Pages 4-3, Section 4.1.2, Sediment:** The NJDEP Severe Effects level (SEL) Ecological sediment Screening Criterion (ESC) for DEHP is 0.750 mg/kg. The Low Effects Level (LEL) ESC is 0.182 mg/kg. NJDEP does not recognize the referenced 2.65 mg/kg DEHP Probable Effects Level (MacDonald, 1994) utilized in Table 4-2 or the "NJDEP ESC of 1.0 μg/L (based on the PQL)" referenced on page 4-6.

4. **Page 4-5, Table 4-3 and Figures 3 and 4:** Pore water sample results from samples (PW-R-01, -08, and -09) collected along the left bank in the Rockaway River (Table 4-3 and Figure 3) clearly indicate an area of DEHP-contaminated groundwater discharge representing a risk to benthic/aquatic biota. Likewise, sediment sample results collected in the Eastern Drainage Ditch show DEHP contamination and risk to benthic/aquatic biota (Figure 4). These risks cannot be dismissed, regardless of their estimated magnitude.

5. **Page 4-10, Section 4.3.2, Sediment:** One "upstream background" sediment sample (SED-RR-TA-LB) with a positive detection of DEHP is not representative of background conditions, as six other sediment samples collected in this "Rockaway River Upstream Area" were essentially non-detect for DEHP.

6. **Page 5-2, Section 5, Conclusions and Recommendations:** Further information should be included in this section regarding the pore water sampling data collected. Further, the report recommends that the surface water monitoring in the river be reduced from quarterly to semiannual frequency. However, based upon the pore water data provided, it appears that groundwater contamination is discharging into the Rockaway River, therefore, a reduction in monitoring frequency would not be appropriate at this time. Quarterly monitoring of sediment, surface water, and pore water should be continued in the Eastern Drainage Ditch and the Rockaway River.

   The Agencies support the recommendation to evaluate engineering alternatives to address affected sediment in the Eastern Drainage Ditch.

.